

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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MEREDITH CORPORATION, et al.

v.

SESAC, LLC, et al.

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Case No. 09 Civ. 9177 (PAE)

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION  
FOR PRELIMINARY APPROVAL OF SETTLEMENT**

PLEASE TAKE NOTICE that Meredith Corporation, The E.W. Scripps Company, Scripps Media, Inc., Hoak Media, LLC, Hoak Media of Nebraska, LLC, and Hoak Media of Dakota, LLC, individually and on behalf of all other similarly situated local television stations, by their attorneys Weil, Gotshal & Manges LLP, move this Court, before the Honorable Paul A. Engelmayer, United States District Judge, at the United States District Courthouse, 40 Foley Square, New York, NY 10007, for an order pursuant Rule 23 of the Federal Rules of Civil Procedure: (1) granting leave to file the Second Amended Class Action Complaint; (2) provisionally certifying the settlement class defined therein; (3) granting preliminary approval of the settlement; (4) directing that settlement class members be given notice of the pendency of this litigation and the contemplated settlement in substantially the same form and manner set forth herein; and (5) setting dates for, *inter alia*, settlement class members to submit objections or opt out of the proposed settlement, and the hearing by the Court to consider final approval of the settlement.

This Motion is based upon the accompanying Memorandum of Law and the Declaration of Eric S. Hochstadt and the exhibits attached thereto (including the settlement agreement), as well as the pleadings, papers, and decisions filed in this proceeding, and any additional argument the Court requests. Counsel for Plaintiffs has conferred with counsel for SESAC and this Motion is unopposed.

Dated: October 15, 2014  
New York, NY

Respectfully submitted,

By: s/ Steven A. Reiss

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